February 23, 2004

Mr. Peter Gold
Water Protection Division
USEPA REGION 3 - 3WP12
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Gold:

This letter is to submit some additional information as an addendum to the general standard TMDLs for Black Creek and Dumps Creek. Per your request, the TMDL allocation tables in the Black Creek and Dumps Creek TMDL reports have been revised to represent all permitted temporary BMPs installed to control nonpoint source pollution resulting from surface mining operations in the TMDLs' waste load allocations (WLA). Some of the loading from these facilities was originally shown as part of the non-permitted load allocation in the submitted TMDL reports.

An important concept to coalfield TMDL development, evident throughout the report, the model, and the allocations, is compatibility with remining. Because remining an area of abandoned mined lands contributing existing pollution loads to an impaired stream reduces that load without additional waste load, the allocations table initially represented existing mining discharges – depending on their characterization as traditional mines or remining operations - under both WLA and LA respectively. Identification of this load adjustment as the transient waste load is intended to keep the revised table consistent with the report narrative and to maintain the concept of the TMDL's compatibility with remining as originally anticipated.

The revised TMDL tables for Dumps Creek and Black Creek are attached in Table 5.2 (Attachment 1) and Table 5.3 (Attachment 2). They are intended to replace tables 5.2 and 5.3 in the respective TMDL reports. Preceding each table is a description of the changes made from the originally submitted table to the amended version.

I trust that you find this addendum satisfactory and look forward to receiving approval of the TMDLs for Black Creek and Dumps Creek. If you have any questions or need additional information, please contact me at (804) 698-4099.

Sincerely,

Jutta Schneider
TMDL Modeling Coordinator

Attachments

Cc: Joey O'Quinn, DMME
Charles Martin, DEQ
Nancy Norton, DEQ
File

Attachment 1 - Amendment to Table 5.2, Dumps Creek TMDL

Revisions to Table 5.2 include 1) correcting the TMDLs to account for a double-counting error, 2) breaking out the "Transient Waste Load" for TSS by permit number using integrated flow volumes, and 3) including additional TSS and TDS transient waste load WLAs for permits that were not included in the original TMDL table.

Regarding 1), the TMDLs were corrected from 1,019,297 kg/yr to 971,583 kg/yr for TSS and from 5,192,911 kg/yr to 5,015,679 kg/yr for TDS, to account for an erroneous double-counting of the transient load in the original document.

Regarding 2), the transient waste load represents the waste load from runoff-controlling BMPs (i.e. ponds) that are likely to be removed upon completion of current mining operations. WLAs for each permit were calculated by integrating the permitted load over time using recorded flow measurements and permitted concentrations. This method is consistent with the calculations for other permitted discharges in the watershed. Changing from an annual average to an integrated flow volume resulted in a modification of the original transient waste load from 47,713 kg/year to 60,468 kg/year.

Regarding 3), additional transient waste load allocations needed to be developed for permits that were issued after the modeling period but before the TMDL approval. During modeling for allocations, only those ponds that were in place during the modeled period were included in the model. The original TMDL table was developed by taking only the modeled permits into consideration. Additional transient waste load was allocated for ponds controlling runoff from land that was modeled without controls during allocation runs. In adding the permits for these ponds to Table 5.2, loads were shifted from the LA to the WLA to account for this shift in loads from uncontrolled runoff to controlled discharges. The additional permits are listed below:

NPDES 0081607 MPID 0002608
NPDES 0081607 MPID 0002609
NPDES 0081607 MPID 0002612
NPDES 0081607 MPID 0002613
NPDES 0081681 MPID 0003251
NPDES 0081681 MPID 0003252
NPDES 0081681 MPID 0003253
NPDES 0081758 MPID 0003905
NPDES 0081758 MPID 0003906
NPDES 0081758 MPID 0003907
NPDES 0080480 MPID 3985033
NPDES 0080481 MPID 3985059
NPDES 0080483 MPID 5183660

Table 5.2 TMDL allocations chosen for the Dumps Creek general quality impairment. (shaded cells indicate permits not originally represented as WLAs)

		TSS (kg/year)	TDS (kg/year)
Waste Load Allocation		***316,523***	***1,631,575***
NPDES 0081399	MPID 3970218	12	62
NPDES 0081132	MPID 5170002	3	15
NPDES 0080483	MPID 5183662	104,336	538,374
NPDES 0080483	MPID 5183655	676	3,488
NPDES 0080483	MPID 5470215	2,180	11,249
NPDES 0081309	MPID 0003867	72	372
NPDES 0080481	MPID 3985052	14	72
NPDES 0080480	MPID 3985030	33,729	174,042
NPDES 0080481	MPID 3985053	4	21
NPDES 0080481	MPID 3985054	7,203	37,167
Transient Waste Load [1]			
NPDES 0081478	MPID 0000984	1,792	
NPDES 0081758	MPID 0001178	5,370	
NPDES 0081607	MPID 0002608	8,844	
NPDES 0081607	MPID 0002609	80,903	
NPDES 0081607	MPID 0002612	594	
NPDES 0081607	MPID 0002613	1,258	
NPDES 0081681	MPID 0003251	5,523	
NPDES 0081681	MPID 0003252	1,289	
NPDES 0081681	MPID 0003253	2,193	
NPDES 0081758	MPID 0003905	3,237	
NPDES 0081758	MPID 0003906	2,199	
NPDES 0081758	MPID 0003907	1,700	
NPDES 0081398	MPID 3970178	4,654	
NPDES 0080071	MPID 3982946	16	
NPDES 0080255	MPID 3983285	38	
NPDES 0080363	MPID 3983540	78	866,713 [2]
NPDES 0080480	MPID 3985028	8,049	
NPDES 0080480	MPID 3985033	12	
NPDES 0080481	MPID 3985044	7,676	
NPDES 0080481	MPID 3985045	71	
NPDES 0080481	MPID 3985046	20,469	
NPDES 0080481	MPID 3985047	7,393	
NPDES 0080481	MPID 3985048	353	
NPDES 0080481	MPID 3985049	2,974	
NPDES 0080481	MPID 3985050	923	
NPDES 0080481	MPID 3985051	22	
NPDES 0080481	MPID 3985055	21	
NPDES 0080481	MPID 3985056	269	
NPDES 0080481	MPID 3985059	2	
NPDES 0081132	MPID 5170001	185	
NPDES 0080483	MPID 5183658	115	
NPDES 0080483	MPID 5183660	72	
Load Allocation		***655,060***	***3,384,104***
TMDL		**971,583**	**5,015,679**

[1] The transient waste load represents the waste load from runoff-controlling BMPs (i.e. ponds) that are likely to be removed upon completion of current mining operations.

[2] TDS from transient waste loads are presented as a combined load from all transient sources.

Attachment 2 - Amendment to Table 5.3, Black Creek TMDL

Revisions to Table 5.3 include 1) changing the units from kg/day to kg/year, 2) breaking out the "Transient Waste Load" for Total Mn by permit number using integrated flow volumes, and 3) including additional Total Mn transient waste load WLAs for permits that were not included in the original TMDL table.

Regarding 1), the TMDL units were changed from kg/day to kg/year to be consistent with the Dumps Creek TMDL units.

Regarding 2), the transient waste load represents the waste load from runoff-controlling BMPs (i.e. ponds) that are likely to be removed upon completion of current mining operations. WLAs for each permit were calculated by integrating the permitted load over time using recorded flow measurements and permitted concentrations.

Regarding 3), additional transient waste load was allocated for ponds controlling runoff under Rahall permits. In adding the permits for these ponds to Table 5.3, loads were shifted from the LA to the WLA to account for this shift in loads. The Rahall permits are listed below:

NPDES 0081576 - Rahall 1
NPDES 0081576 - Rahall 2
NPDES 0081576 - Rahall 3

Table 5.3 TMDL allocations chosen for the Black Creek general quality impairment (shaded cells indicate permits not originally represented as WLAs)

	Total Mn (kg/year)	**Conductivity** (µMho-L/cm-year)	**Alkalinity** ($kgCaCO_3$/year)
Waste Load Allocation [1]	***2,127***	***N/A***	***N/A***
NPDES 0081542	40	N/A	N/A
Transient Waste Load [2]			
NPDES 0081576	149	N/A	N/A
NPDES 0081576	530	N/A	N/A
NPDES 0081576	630	N/A	N/A
NPDES 0081576	179	N/A	N/A
NPDES 0081576	398	N/A	N/A
NPDES 0081542	201	N/A	N/A
Load Allocation	***1,599***	***5,865,550***	***842,997***
Subwatershed 1	64	288,913	49,674
Subwatershed 2-5	421	1,184,506	155,231
Subwatershed 6-11	927	2,324,451	517,925
Subwatershed 12-21	187	2,067,680	120,167
TMDL	**3,726**	**5,865,550**	**842,997**

[1] These discharges are only permitted for the control of pH, total suspended solids, total manganese, and total iron. Other constituent loads must be considered as part of the load allocation.

[2] The transient waste load represents the waste load from runoff-controlling BMPs (i.e. ponds) that are likely to be removed upon completion of current mining operations.